

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA, STATE  
OF ILLINOIS and COOK COUNTY *ex rel.*  
MATTHEW BLAUM,

Relator,

and HOT SHOTS NM, LLC,

Plaintiffs,

v.

TRIAD ISOTOPES, INC., COVIDIEN, INC.,  
TODD GIBA, DONALD TREPASHKO, M.D.,  
SAMI DISTRIBUTORS, INC., SARAH  
SAMI, and FAISEL SAMI,

Defendants.

Civil Case No. 1:11-cv-8098

Judge Robert M. Dow, Jr.

**JOINT STIPULATION OF DISMISSAL WITH PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a) and the *qui tam* provisions of the False Claims Act, 31 U.S.C. § 3729 *et seq.*, and the Illinois False Claims Act, 740 ILCS 175/1 *et seq.*, Relator Matthew Blaum, Plaintiff Hot Shots NM, LLC, and Defendants Triad Isotopes, Inc., Covidien, Inc., Todd Giba, Donald Trepashko, and Sami Distributors, Inc. (collectively, the “Parties”) hereby stipulate to the entry of an order dismissing the above-captioned action with prejudice. This stipulation of dismissal with prejudice is made pursuant to a separate Settlement Agreement between Relator and

the Defendants. Relator has informed the United States and the State of Illinois of the settlement and this stipulation of dismissal, and Relator has been notified that neither the United States nor the State of Illinois objects to the dismissal. No party seeks from the Court an award of fees or costs.

A proposed order to this effect is being emailed to  
[Proposed\\_Order\\_Dow@ilndcourts.gov](mailto:Proposed_Order_Dow@ilndcourts.gov), per the Court's preferences.

Dated: November 27, 2017

Respectfully submitted,

Relator Matthew Blaum

Todd Giba

By: /s/ Daniel M. Twetten  
Daniel M. Twetten  
*Counsel for Relator*

By: /s/ John Grady  
John Grady  
*Counsel for Todd Giba*

Hot Shots NM, LLC

Donald Trepashko, M.D.

By: /s/ Daniel M. Twetten  
Daniel M. Twetten  
*Counsel for HotShots NM, LLC*

By: /s/ Cory D. Anderson  
Cory D. Anderson  
*Counsel for Donald Trepashko, M.D.*

Covidien, Inc.

Triad Isotopes, Inc.

By: /s/ Christopher J. Walsh  
Christopher J. Walsh  
*Counsel for Covidien, Inc.*

By: /s/ Efrem M. Grail  
Efrem M. Grail  
*Counsel for Triad Isotopes, Inc.*

Sami Distributors, Inc.

By: /s/ Keevan D. Morgan  
Keevan D. Morgan  
*Counsel for Sami Distributors, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 27, 2017, a copy of the foregoing was served on all counsel of record via the Court's ECF system.

/s/ Daniel M. Twetten